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March 19, 2004

EX PARTE – VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Re: *In the Matter of AT&T Corp. Petition for Declaratory Ruling Regarding
Enhanced Prepaid Calling Card Services; WC Docket No. 03-133*
Notice of Oral and Written Ex Parte Presentation

Dear Ms. Dortch:

On March 19, 2004, Tina Pidgeon and Lisa Youngers, both of General Communication, Inc. ("GCI"), met with Dan Gonzalez, Senior Legal Advisor to Commissioner Martin regarding the above-captioned proceeding.

In the meeting, GCI explained that AT&T's Petition for Declaratory Ruling is nothing more than an attempt to circumvent the authority of the Regulatory Commission of Alaska ("RCA") and to avoid payment of intrastate access charges relative to its prepaid calling card services. AT&T's legally unsustainable self-help of mischaracterizing its intrastate calling card minutes unfairly shifts Alaska intrastate access charge recovery to GCI and other IXCs and should be rejected without delay. Pursuant to clear FCC legal precedent, the jurisdictional nature of AT&T's prepaid calling card service within a single state is intrastate. The inclusion of an unsolicited advertisement into the call set-up process as described in AT&T's Petition does not change this jurisdictional status nor does such an advertisement render the call an "enhanced" service. As such, the FCC has sufficient legal grounds to deny AT&T's Petition on the jurisdictional precedent alone, and GCI urged the FCC to dismiss AT&T's petition expeditiously. Intercarrier compensation or USF reform should be left to the appropriate dockets, not through spurious legal theories and self-granted exemptions.

In accordance with the Commission's rules, a copy of this letter with attachments is being filed in the above-captioned proceeding.

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If you have any questions, please contact the undersigned at (202) 457-8815.

Sincerely,

/s/

Lisa R. Youngers
Federal Regulatory Attorney

cc: (via electronic mail)
Dan Gonzalez, FCC